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8 Attorneys for Defendants Apple Inc.,  
 Timothy Cook and Luca Maestri

9 [additional counsel appears on signature page]

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

IN RE APPLE INC. SECURITIES  
 LITIGATION

Case No. 4:19-cv-02033-YGR

**CLASS ACTION**

This Document Relates to:  
 ALL ACTIONS.

**STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING DEADLINE TO  
 SUBMIT STATEMENT OR  
 DECLARATION IN SUPPORT OF  
 SEALING REQUEST**

Hon. Yvonne Gonzalez Rogers

1 This Stipulation is entered into by and among Lead Plaintiff Norfolk County Council as  
2 Administering Authority of the Norfolk Pension Fund (“Lead Plaintiff”) and Defendants Apple  
3 Inc. (“Apple”), Timothy Cook, and Luca Maestri (collectively “Defendants” and together with the  
4 Lead Plaintiff, the “Parties”), through their respective attorneys of record.

5 WHEREAS, on October 20, 2022, Lead Plaintiff filed its Opposition to Defendants’  
6 Motion for Summary Judgment, and its Opposition to Defendants’ Motion to Exclude Expert  
7 Testimony (collectively, the “Oppositions”);

8 WHEREAS, because the Oppositions make reference to a substantial volume of discovery  
9 materials that Defendants have designated as Confidential or Highly Confidential pursuant to the  
10 Stipulated Protective Order, Lead Plaintiff has also filed three Administrative Motions to  
11 Consider Whether Another Party’s Material Should Be Sealed (the “Administrative Motions”)  
12 [Dkt. Nos. 321, 322, and 323];

13 WHEREAS, in light of the volume of materials provisionally lodged under seal in  
14 connection with the Administrative Motions, Defendants have requested a one-week extension of  
15 the deadline set by Local Rule 79-5(f)(3) to file a statement and/or declaration in support of any  
16 sealing request in connection with the Administrative Motions, and Lead Plaintiff does not  
17 oppose that request;

18 NOW THEREFORE, it is stipulated and agreed among the undersigned Parties, and  
19 respectfully submitted for the Court’s approval as follows:

20 Defendants shall file any statement and/or declaration in support of any sealing request in  
21 connection with the Administrative Motions no later than November 3, 2022.

22 **IT IS SO STIPULATED.**

23  
24 Dated: October 25, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

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26 */s/ James N. Kramer*

JAMES N. KRAMER

Attorneys for Defendants

Apple Inc., Timothy Cook, and Luca Maestri

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Dated: October 25, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

/s/ Shawn A. Williams  
SHAWN A. WILLIAMS  
Counsel for Lead Plaintiff,  
Norfolk County Council as Administering  
Authority of the Norfolk Pension Fund

**CIVIL L.R. 5-1 ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I, James N. Kramer, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order regarding Deadline to Submit Statement or Declaration in Support of Sealing Request. In compliance with General Order 45, X.B., I hereby attest that Shawn A. Williams has concurred in this filing.

/s/ James N. Kramer  
JAMES N. KRAMER

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: October 25, 2022

  
HONORABLE YVONNE GONZALEZ ROGERS